## IN THE UNITED STATES BANKRUPTCY COURT FOR EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Frank F. Torok, II

Debtor

CASE NO.: 24-13427-pmm

**CHAPTER 13** 

Fay Servicing, LLC as servicer for US Bank Trust National Association, Not In

Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust

v.

Judge: Patricia M. Mayer

Hearing Date:

Frank F. Torok, II Scott F. Waterman - Trustee

Respondents

Objection Deadline:

### **NOTICE OF APPEARANCE**

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf of Fay Servicing, LLC as servicer for US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust, and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

### FRIEDMAN VARTOLO LLP

Attorneys for Fay Servicing, LLC as Servicer for US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust 1325 Franklin Avenue, Suite 160 Garden City, NY 11530 Bankruptcy@FriedmanVartolo.com

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints, and orders, whether written or oral, formal, or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: December 26, 2024

By: /s/ Lauren Moyer, Esq. Lauren Moyer, Esq. FRIEDMAN VARTOLO LLP Attorneys for Movant 1325 Franklin Avenue, Suite 160 Garden City, NY 11530 T: (212) 471-5100 F: (212) 471-5150

Bankruptcy@FriedmanVartolo.com

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Frank F. Torok, II Scott F. Waterman - Trustee Respondents

### CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on December 26, 2024.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was first-class mail and electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: 12/26/2024

By: /s/ Lauren Moyer, Esq.
Lauren Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100

F: (212) 471-5150

Bankruptcy@FriedmanVartolo.com

### Service by Regular Mail

Frank F. Torok, II 5201 Stansfield Drive Zionsville, PA 18092 Bankruptcy Pro-Se Debtor

## **Service by NEF**

Scott F. Waterman Chapter 13 Trustee 2901 St. Lawrence Ave. Suite 100 Reading, PA 19606 *Bankruptcy Trustee* 

United States Trustee Office of United States Trustee Robert N.C. Nix Federal Building 900 Market Street Suite 320 Philadelphia, PA 19107 U.S. Trustee